

[Submitting Counsel on Signature Page]

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

People of the State of California, et al.,

v.

*Meta Platforms, Inc., Instagram, LLC, Meta
Payments, Inc., Meta Platforms Technologies,
LLC,*

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

THIS DOCUMENT RELATES TO:
4:23-cv-05448

Case Nos.: 4:23-cv-05448-YGR
4:22-md-03047-YGR

MDL No. 3047

**DECLARATION IN SUPPORT OF
STATE ATTORNEYS GENERAL'S
MOTION FOR EXTENSION OF TIME**

I, LAUREN DICKEY, hereby declare and state as follows:

1. I am a First Assistant Attorney General at the Colorado Department of Law. I am a member in good standing of the State Bar of Colorado. I am one of the attorneys representing the Colorado Attorney General in this action. I make this declaration based on my own personal

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CASE Nos.: 4:23-CV-05448-YGR
4:22-MD-03047-YGR

1 knowledge. If called upon to testify, I could and would testify completely to the truth of the matters
2 stated herein.

3 2. The State Attorneys General (State AGs) served a Rule 45 subpoena on third-party
4 company Mindshare Media, Ltd. (Mindshare) on March 11, 2025.

5 3. To serve the subpoena, the State AGs retained a process server who provided an
6 affidavit of service attesting that Mindshare was served at the address of its corporate registered
7 agent, Corporate Creations Network Inc., on March 11.

8 4. The State AGs did not receive a timely response to this subpoena, and so contacted
9 Mindshare on April 8, 2025, to inquire as to the status of a response.

10 5. The State AGs received a response from Mindshare's counsel the same day, and the
11 parties were able to discuss the parameters of the subpoena and the potential timing of a production.
12 Mindshare's counsel represented, however, that Mindshare had no record of receiving the
13 subpoena, and indicated that although objections would be forthcoming, Mindshare's counsel
14 agreed to discuss the production of certain documents with her client.

15 6. Today, on April 11, the State AGs received correspondence from Mindshare's
16 counsel stating that Mindshare believes it was never properly served with the subpoena and thus is
17 under no obligation to respond.

18 7. The State AGs require additional time to investigate this assertion, including
19 contacting their process server, to assess whether Mindshare's objection is appropriate and to
20 evaluate next steps.

21 8. The State AGs have not previously sought any extension of the deadline to enforce
22 their Rule 45 subpoena to Mindshare.

23 9. The requested extension will not affect the other deadlines in this case. Although
24 fact discovery is closed, the parties are continuing to exchange information, and there is no trial
25 date currently set.

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1 10. The State AGs thus respectfully seek this brief extension, to and including April 18,
2 2025, to preserve their ability to move to enforce the subpoena or to take other steps to obtain the
3 information they are seeking as appropriate.

4 I declare under penalty of perjury that the foregoing is true and correct. Executed on April
5 11, 2025, in Denver, Colorado.

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8 **Dated: April 11, 2025**

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10 Respectfully submitted,

11 /s/ Lauren Dickey
12 Lauren Dickey
13 First Assistant Attorney General
14 Colorado Department of Law
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